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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBIT 1 TO THE DECLARATION  
OF HONG-AN VU IN SUPPORT OF  
ITS REPLY IN SUPPORT OF  
MOTION TO ENFORCE THE  
COURT'S JUNE 7, 2017 ORDER  
(DKT. 1040 (CORRECTED AT DKT.  
1062))**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Otto Trucking's Administrative Motion to File Under Seal Exhibit 1 to the Declaration  
6 of Hong-An Vu in Support of its Reply in Support of Motion to Enforce the Court's June 7, 2017  
7 Order (Dkt. 1040 (Corrected at Dkt. 1062)).

8 2. I have reviewed the following documents and confirmed that only the portions  
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to the Declaration of Hong-An Vu (Dkt. 1062-3) (Corrected version of Dkt. 1040-3)	Blue-highlighted portions

14 3. The blue-highlighted portions on pages 142, 144, 146, 150, 152, 153, and 154 of  
15 Exhibit 1 contain highly confidential information regarding financial terms of a business  
16 agreement and financial information of Ottomotto, including information about the structure,  
17 economic value, detailed monetary terms, and negotiations of business agreements with  
18 counterparties who have ongoing relationships with Defendants. This highly confidential  
19 information is not publicly known, and its confidentiality is strictly maintained. If this  
20 information were to be released to the public, Defendants' competitors and counterparties would  
21 have insight to how Defendants structure their business agreements, including what potential  
22 monetary terms have been offered, which would allow them to tailor their own business  
23 negotiation strategy, such that Uber's competitive standing could be harmed.

24 4. The blue-highlighted portions on pages 144, 145, 146, 147, 150, 151, 152, and 153  
25 of Exhibit 1 also contain highly confidential information regarding Uber's competitive analysis of  
26 the self-driving market, strategic priorities, and development of its own detailed market strategy,  
27 including Uber's internal development timeline estimate and internal analyses of potential  
28 business and production models. This highly confidential information is not publicly known, and

6. Defendants' request to seal is narrowly tailored to those portions of Otto Trucking's Exhibit 1 that merit sealing.

Michelle Yang

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: August 1, 2017

/s/ Arturo J. González  
Arturo J. González